

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DOMINIC GWINN,)	
)	
Plaintiff,)	Case No. 23-cv-1823
)	
v.)	Hon. Jeremy C. Daniel
)	
CITY OF CHICAGO, <i>et al.</i> ,)	
)	
Defendants.)	

**EXHIBIT B TO FINAL PRETRIAL ORDER:
PLAINTIFF'S LIST OF TRIAL EXHIBITS**

Plaintiff, Dominic Gwinn, by its undersigned counsel of record, hereby submits its attached list of trial exhibits in connection with the trial of this matter, scheduled to commence on September 15, 2025. Plaintiff reserves the right to augment this list based on any inadvertent omission, trial materials disclosed by Defendants, testimony of any witness at trial, or any good faith need. Plaintiff reserves the right to use any materials, whether or not disclosed herein, for the purpose of impeachment or rebuttal, including, but not limited to, prior witness testimony (written or oral). Plaintiff reserves the right not to introduce or seek admission into evidence of any materials on this list.

This 18th day of August, 2025.

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TRIAL EX. NO.	DESCRIPTION	BATES/DKT. NOS.	DEFENDANTS' OBJECTION(S)
P1	Video file: VID_20200717_192612, created on July 17, 2020 (the “Work”)	GWINN 0001	Defendants object to GWINN 0001 because it is not the best evidence of the “Work” at issue. Fed R. Evid. 1004. The “Work” is what was deposited with the U.S. Copyright Office, which is available and has been disclosed.
P2	Screenshot of House Judiciary Committee GOP display of Work	GWINN 0015-17	Defendants object to GWINN 0015-17 as lacking foundation, <i>see</i> Fed. R. Evid. 901, and lacking relevance, <i>see</i> Fed. R. Evid. 401.
P3	Screenshot of Video Leak Police YouTube display of Work	GWINN 0018	Defendants object to GWINN 0018 as lacking foundation, <i>see</i> Fed. R. Evid. 901, and lacking relevance, <i>see</i> Fed. R. Evid. 401.
P4	Screenshot of Breitbart YouTube display of Work	GWINN 0019	Defendants object to GWINN 0019 as lacking foundation, <i>see</i> Fed. R. Evid. 901, and lacking relevance, <i>see</i> Fed. R. Evid. 401.

P5	Screenshot of CPD YouTube display of Work	GWINN 0020	Defendants object to GWINN 0020 as lacking foundation, <i>see</i> Fed. R. Evid. 901, and lacking relevance, <i>see</i> Fed. R. Evid. 401.
P6	Screenshot of Fox32 display of Work	GWINN 0021-27	Defendants object to GWINN 0021-27 as lacking foundation, <i>see</i> Fed. R. Evid. 901, and lacking relevance, <i>see</i> Fed. R. Evid. 401.
P7	Screenshot of Commissioner David Brown Twitter display of Work	GWINN 0028	Defendants object to GWINN 0028 as lacking foundation, <i>see</i> Fed. R. Evid. 901, and lacking relevance, <i>see</i> Fed. R. Evid. 401.
P8	Screenshot of House Judiciary Committee / C-SPAN display of Work	GWINN 0029	Defendants object to GWINN 0029 as lacking foundation, <i>see</i> Fed. R. Evid. 901, and lacking relevance, <i>see</i> Fed. R. Evid. 401.
P9	Screenshot of Fox News display of Work	GWINN 0030-31	Defendants object to GWINN 0030-31 as lacking foundation, <i>see</i> Fed. R. Evid. 901, and lacking relevance, <i>see</i> Fed. R. Evid. 401.
P10	Screenshot of Daily Wire display of Work	GWINN 0032-33	Defendants object to GWINN 0032-33 as lacking foundation, <i>see</i>

			Fed. R. Evid. 901, and lacking relevance, <i>see</i> Fed. R. Evid. 401.
P11	Twitter Terms of Service, active in July 2020	GWINN 0034-45	Defendants object to GWINN 0034-45 as lacking foundation, <i>see</i> Fed. R. Evid. 901, and lacking relevance, <i>see</i> Fed. R. Evid. 401.
P12	City Emails re: video compilation video, dated 7.19.2020 – 7.20.2020	CITY 0001-03	Defendants object that CITY 0001-3 is not a complete copy of the email thread. Defendants would not object to CITY 0001-7, which is a complete copy.
P13	General Order -- Use of the Internet	CITY 0055-57	Defendants object to CITY 0055-57 as lacking foundation, <i>see</i> Fed. R. Evid. 901, and lacking relevance, <i>see</i> Fed. R. Evid. 401.
P14	General Order – Access to Computerized Data, Dissemination and Retention of Computer Data	CITY 0048-54	Defendants object to CITY 0048-54 as lacking foundation, <i>see</i> Fed. R. Evid. 901, and lacking relevance, <i>see</i> Fed. R. Evid. 401.
P15	General Order -- Use of Social Media Outlets	CITY 0058-61	Defendants object to CITY 0058-61 as lacking foundation, <i>see</i> Fed. R. Evid. 901, and lacking

			relevance, <i>see</i> Fed. R. Evid. 401.
P16	Special Order – Social Media Outlet: Twitter	CITY 0071-74	Defendants object to CITY 0071-74 as lacking foundation, <i>see</i> Fed. R. Evid. 901, and lacking relevance, <i>see</i> Fed. R. Evid. 401.
P17	Video file -- CPD Skycam footage of protests	CITY 0095	Defendants object to Plaintiff's use of CITY 0095 as lacking relevance, <i>see</i> Fed. R. Evid. 401.
P18	Video file -- CPD Skycam footage of protests	CITY 0096	Defendants object to Plaintiff's use of CITY 0096 as lacking relevance, <i>see</i> Fed. R. Evid. 401.
P19	Video file -- CPD Skycam footage of protests	CITY 0097	Defendants object to Plaintiff's use of CITY 0097 as lacking relevance, <i>see</i> Fed. R. Evid. 401.
P20	Video file -- CPD Skycam footage of protests	CITY 0098	Defendants object to Plaintiff's use of CITY 0098 as lacking relevance, <i>see</i> Fed. R. Evid. 401.
P21	Video file -- CPD Skycam footage of protests	CITY 0099	Defendants object to Plaintiff's use of CITY 0099 as lacking relevance, <i>see</i> Fed. R. Evid. 401.

P22	Video file -- CPD Skycam footage of protests	CITY 0100	Defendants object to Plaintiff's use of CITY 0100 as lacking relevance, <i>see</i> Fed. R. Evid. 401.
P23	Video file -- CPD Skycam footage of protests	CITY 0101	Defendants object to Plaintiff's use of CITY 0101 as lacking relevance, <i>see</i> Fed. R. Evid. 401.
P24	Video file -- CPD Skycam footage of protests	CITY 0102	Defendants object to Plaintiff's use of CITY 0102 as lacking relevance, <i>see</i> Fed. R. Evid. 401.
P25	List of email recipients in Distribution List	CITY 0103	Defendants object to Plaintiff's use of CITY 0103 as lacking relevance, <i>see</i> Fed. R. Evid. 401.
P26	List of email recipients in Distribution List	CITY 0104	Defendants object to Plaintiff's use of CITY 0104 as lacking relevance, <i>see</i> Fed. R. Evid. 401.
P27	List of email recipients in Distribution List	CITY 0105	Defendants object to Plaintiff's use of CITY 0105 as lacking relevance, <i>see</i> Fed. R. Evid. 401.
P28	List of email recipients in Distribution List	CITY 0106	Defendants object to Plaintiff's use of CITY 0106 as lacking relevance,

			<i>see</i> Fed. R. Evid. 401.
P29	7.20.2020 Email Distribution of Work from City to Distribution Lists MajorMedia1, MajorMedia2, MajorMedia3, MajorMedia4, ChicagoAldermanicWards, IllinoisStateReps, and IllinoisStateSenators	CITY 0107	Defendants object to Plaintiff's use of CITY 0107 as lacking relevance, <i>see</i> Fed. R. Evid. 401.
P30	2020 City of Chicago Budget Overview, pages 1, 36, 115-116, 168.		Defendants object on numerous grounds. This information was never disclosed nor produced by Gwinn in discovery. Defendants are unaware of what this exhibit is. This exhibit has not been authenticated, lacks foundation, and is irrelevant. <i>See</i> Fed. R. Evid. 401, 901.
P31	2025 City of Chicago Budget Overview, pages 1, 29, 112-13, 175.		Defendants object on numerous grounds. This information was never disclosed or produced by Gwinn in discovery. Defendants are unaware of what this exhibit is. This exhibit has not been authenticated, lacks foundation, and is irrelevant. <i>See</i> Fed. R. Evid. 401, 901.
P32	Deposition Transcript of David O'Neal Brown, dated February 26, 2024		Defendants object to Plaintiff's use of deposition transcripts at trial for available

			witnesses. <i>See</i> Fed. R. Civ. P. 32.
P33	Deposition Transcript of Kevin Bruno, dated February 5, 2024		Defendants object to Plaintiff's use of deposition transcripts at trial for available witnesses. <i>See</i> Fed. R. Civ. P. 32.
P34	Deposition Transcript of Don Terry, dated February 7, 2024		Defendants object to Plaintiff's use of deposition transcripts at trial for available witnesses. <i>See</i> Fed. R. Civ. P. 32.